

# NENA

## The 9-1-1 Association

1700 Diagonal Road | Suite 500 | Alexandria, VA 22314

Ms. Marlene H. Dortch, *Secretary*  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

December 6<sup>th</sup>, 2017

Re: FCC Invites Comment on LightSquared Request to Modify its ATC Authorization; &  
IB Invites Comment on NTIA Letter Regarding LightSquared Conditional Waiver;  
IB Docket Nos. 12-340 & 11-109.

Dear Ms. Dortch:

I write to express concern at the negative impacts to public safety communications and assured positioning services that may potentially arise, should the Commission grant Ligado's (formerly LightSquared's) application to modify its Ancillary Terrestrial Component (ATC) authorization.

Public safety agencies across all disciplines rely on Mobile Satellite Service (MSS) for mission-critical voice communications in the most challenging maritime and remote environments. Outside Land-Mobile Radio (LMR) and Commercial Mobile Radio Service (CMRS) coverage areas, MSS-based push-to-talk service is often the *only* link between field responders and the Public Safety Answering Points (PSAPs) that actively monitor and control communications for life-saving activities like dispatching backup units. Consequently, the importance of protecting responder access to these services cannot be overstated. Among the MSS solutions offering this service, Iridium stands out as one of the most-deployed. Moreover, evolving uses of the Iridium constellation, including particularly the offering of Satelles Timing and Location (STL) assured positioning service, offer significant potential benefits to public safety applications beyond responder-to-responder communications. For instance, spoof-resistant location and non-GNSS-based precise time transfer service can be used to improve the security and accuracy of both responder and civilian systems (e.g., Wireless E9-1-1) that rely on today's GNSS-based positioning and timing solutions.

Because other parties have addressed at length the technical considerations underpinning concerns about the unprecedented use of MSS spectrum in an ATC-primary architecture, NENA will not recap them here. We note, however, that the Commission has previously recognized the critical role played by orbital MSS services by promulgating rules to protect these services from MSS ATC uses (*e.g.*, 47 C.F.R. § 25.255). We therefore urge the Commission to proceed again with extreme caution, only after careful consideration of all potential impacts that could result from approving Ligado's application.

Sincerely,



Telford E. Forgety, III; "Trey"  
*Director of Government Affairs  
& Regulatory Counsel*